430-1084

ORIGINAL

QUALITY DISTRIBUTION

Please reply to: 150 E. Pennsylvania Ave.
Suite 125
Downingtown, PA 19335

Certified Mail – 7000 1670 0012 0864 8826
Return Receipt Requested

October 17, 2001

Ms. Carlyn Winter Prisk (3HS11)
U.S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Reference: Lower Darby Creek Area Superfund Site – Clearview Landfill, Folcroft Landfill, and Folcroft Landfill Annex

Dear Ms. Prisk:

Pursuant to the Agency's August 2, 2001 letter addressed to Thomas L. Finkbiner, Chemical Leaman Tank Lines, Inc., c/o Quality Distribution, Inc., Quality Distribution herein responds on behalf of Chemical Leaman Tank Lines, Inc. ("CLTL" or "Chemical Leaman") to your request for information regarding the Lower Darby Creek Area Superfund Site (the "Site").

Beyond responding to the Agency's specific inquiries, CLTL wishes to note some of the difficulties that it has faced in preparing the response. The Agency seeks information concerning events that may have occurred approximately 25 to 45 years ago. Given the passage of time, relevant documents from this period, if any, have been difficult to locate or may no longer exist. In addition, Quality Distribution, Inc., the parent of CLTL, did not own the company during the relevant time period, adding another layer of complexity to preparing this response.

Nonetheless, CLTL, in the spirit of cooperation, is responding to the Agency's questions based on current information and belief formed after a reasonable good faith review of documents and other investigative steps. Before doing so, we set forth the following general privileges and objections with regard to the Agency's information request and each question therein, in addition to the objections raised in the specific responses to the Agency's inquiries:

A. CLTL asserts all applicable privileges it has with regard to the Agency's enumerated inquiries, including, without limitation, the attorney-client privilege, work product privilege, the privilege related to materials generated in anticipation

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of litigation, and privileges for materials which are proprietary, company confidential, or trade secret.

B. CLTL objects to the requests for information in the inquiry letter on the grounds that they use undefined terms and are overly-broad, vague, ambiguous, irrelevant and unduly burdensome and otherwise exceed statutory authority under applicable law, including, without limitation, the federal Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. §§ 9601 et seq. ("CERCLA"), and the federal Resource Conservation and Recovery Act, 42 U.S.C. §§ 6901 et seq. ("RCRA") and contravene CLTL's constitutional rights.

C. CLTL objects to the Agency's definition of "you" because the term is overly-broad and it is not possible for CLTL to answer the Agency's requests on behalf of all persons defined therein.

D. CLTL objects to any requirement to produce documents or information already in the possession of a government agency, or already in the public domain.

In response to Information Requests 1 – 24, CLTL states the following:

1. Quality Distribution, Inc.
3802 Corporex Park Drive
Tampa, FL 33619
(813) 630-5826

This inquiry is directed to CLTL, a wholly-owned subsidiary of Quality Carriers, Inc. On August 28, 1998, MTL, Inc. acquired Chemical Leaman Corporation, the parent of CLTL. On March 8, 1999, Articles of Merger were filed in the Office of the Secretary of State of Illinois wherein Chemical Leaman Corporation was merged into Montgomery Tank Lines, Inc., with the surviving corporation changing its name to Quality Carriers, Inc. Subsequent to the acquisition of Chemical Leaman Corporation, MTL, Inc. changed its name to Quality Distribution, Inc.

a. CLTL was incorporated in Delaware on May 15, 1948.
Quality Carriers, Inc. was incorporated in Illinois on August 9, 1965.
Quality Distribution, Inc. was incorporated in Florida on April 19, 1994.

b. CLTL was incorporated in Delaware on May 15, 1948.

c. CLTL is a wholly-owned subsidiary of Quality Carriers, Inc. CLTL objects to the request to state the name and address of all other subsidiaries or affiliated entities of Quality Carriers, as the request is overly broad and seeks information that is outside the scope of this inquiry.

2. CLTL has no current company trucking operations in the Philadelphia region. There is a small corporate support staff located in its Downingtown, Pennsylvania office.

During the period of this inquiry, CLTL operated as a common carrier, transporting chemical commodities in bulk quantities using tank trailers. Chemical Leaman transported both dry and liquid chemical products including some waste materials. Chemical Leaman was neither a manufacturer nor a distributor of chemicals.

CLTL operated two facilities in the Philadelphia area during the relevant time period:

a. Sellers Avenue and Industrial Highway (Rt. 291), Essington, PA (Ridley Township)
- Dates of operation: 1957 through 1984
- All operations ceased in 1984 and the property was sold in 1985.

Chemical Leaman built and operated a tank truck terminal at the Essington location. The tank truck terminal consisted of an office for dispatching tank trucks, a maintenance shop for maintaining and repairing company equipment, and one wash bay used only for washing the exterior surfaces of tank trailers and tractors. Business at this location was primarily the transportation of fuel oils, petroleum products, and liquid petroleum gases in dedicated equipment.

b. 1700 River Road, Croydon, PA
- Dates of operation: 1970 through 1984
- Operations ceased at this facility in 1984. In 1986, the structures and equipment were dismantled and either sold or reused at other locations. Any structure that could not be dismantled was torn down, and 1700 River Road is now an empty parcel of land.

Chemical Leaman built and operated a tank truck terminal at the Croydon location. The tank truck terminal consisted of an office for dispatching tank trucks, a maintenance shop for maintaining and repairing company equipment, a cleaning facility for cleaning the exterior and interior of empty tank trucks and a wastewater pretreatment plant for treating industrial rinsewater from the cleaning of empty tank trucks. The pretreated wastewater was discharged into the municipal sewer system.

3. CLTL objects to this request because it is overly-broad in that it seeks the identity of all persons who may have knowledge of operations and waste disposal practices. CLTL also objects to the request as being unduly burdensome in that it requests CLTL to obtain current addresses of individuals who are no longer employed by the company. Without waiving these objections or the general objections provided above, CLTL provides the following response.

Harry S. Elston (1957 – 1983)
Former Manager, Engineering Department
Chemical Leaman Tank Lines, Inc.
Last known business address:
Chemical Leaman Tank Lines, Inc.
102 Pickering Way
Exton, PA 19341

Donald H. Lambert (1958 – 1984)
Former Supervisor, Tank Cleaning
Chemical Leaman Tank Lines, Inc.
Last known business address:
Chemical Leaman Tank Lines, Inc.
102 Pickering Way
Exton, PA 19341

Michael L. Albero (1970 – August 1998 - Chemical Leaman)
(September 1998 – July 2000 - Quality Carriers)
Current business address:
OCL Corporation (August 2000 – present)
1429 N. Radcliffe St.
Bristol, PA 19007
(215) 788-4125

Robert Dodson (1954 – 1991)
Former Terminal Manager, Essington Terminal
Chemical Leaman Tank Lines, Inc.
Last known business address:
Chemical Leaman Tank Lines, Inc.
102 Pickering Way
Exton, PA 19341

Ed Kinsley (1966 – August 1998 with Chemical Leaman)
(September 1998 – present, with Quality Carriers)
Current business address:
Quality Carriers, Inc.
Cedar Swamp & Cooper Roads
Bridgeport, NJ 08014
(856) 467-1111

Jim Crowe (1970 – 1999)
Former Terminal Manager, Essington Terminal (1973-1984)
Former Manager, Safety Department
Chemical Leaman Tank Lines, Inc.
Current business address:
Venezia Transport Service, Inc.
Ridge Pike
Limerick, PA 19468
(610) 495-5200

Robert W. Plank, Jr. (1957 – 1998)
Terminal Manager, Croydon Terminal (1970-1972)
Former Regional Vice President
Chemical Leaman Tank Lines, Inc.
Last known business address:
Chemical Leaman Tank Lines, Inc.
Old Forge, NY

4. Chemical Leaman owned and operated two facilities in the Philadelphia area during the relevant time period:

a. Sellers Avenue & Industrial Highway (Rt. 291), Essington, PA (Ridley Township)
- Owner: Chemical Properties, Inc., a wholly-owned subsidiary of Chemical Leaman Corporation
- Dates of operation: 1957 to 1984
- The property was sold to Eddystone Equipment & Rental in February 1985

. 1700 River Road, Croydon, PA
- Owner: Chemical Leaman Tank Lines, Inc., a wholly-owned subsidiary of Quality Carriers, Inc.
- Dates of operation: 1970 to 1984
- Currently there are no operations at the site – it is an empty parcel of land.

b. Please see the response to Question 2, above.

c. CLTL objects to this request to the extent that it seeks conclusions of law that hazardous wastes or hazardous substances were generated, stored, treated, transported, or disposed by the owners/operators during the relevant period of this inquiry. Without waiving this objection or the general objections stated above, CLTL provides the following response. To the best of our knowledge, information, and belief, waste disposal was handled by each operating facility. Some responsive documents were located in corporate records and are attached as Exhibit A.

5. a. through c.

After a diligent search of our available records, we have found no other documents relating to the handling and/or generation, storage, treatment, recycling, formulation, disposal, or transportation of any hazardous substance, hazardous waste, pollutant, contaminant, or other waste during the relevant time period other than those listed in Exhibit A.

6. To the best of our knowledge, information, and belief, CLTL never transported any materials to the Site.

7. To the best of our knowledge, information, and belief, CLTL never transported any materials to the Site.

8 a. through h.

To the best of our knowledge, information, and belief, CLTL never transported any materials to the Site.

9. CLTL objects to this request as being vague and ambiguous in that it is unclear whether it relates to transshipment or storage prior to disposal at the Site. Without waiving this objection, or the general objections above, CLTL provides the following response. After a diligent search of our available records, we are unable to determine if any materials were transhipped, stored, or held prior to their final disposal, and if so, at what locations.

10. To the best of our knowledge, information, and belief, and after a diligent search of available records, no materials from our customers were ever taken to the Site.

11. To the best of our knowledge, information, and belief, and after a diligent search of available records, no current or former employees of CLTL ever transported or accompanied materials to the Site.

12. To the best of our knowledge, information, and belief, and after a diligent search of available records, CLTL never transported materials to the Site.

13. To the best of our knowledge, information, and belief, and after a diligent search of available records, CLTL never transported any materials to the Site.

14. CLTL objects to this request as being overly broad and unduly burdensome in that it seeks information regarding all persons or entities that may have taken or sent materials to the site. Without waiving this objection or the general objections above, CLTL provides the following response. To the best of our knowledge, information, and belief, and after a diligent search of available records, CLTL is unable to identify any other individuals or entities who may have shipped or transported materials to the Site.

15. CLTL objects to this request as being overly broad and unduly burdensome and beyond the scope of this inquiry. Without waiving this objection or its general objections above, CLTL provides the following response. CLTL is unable to identify the specific practices or processes at the Croydon and Essington facilities during the relevant time period.

a. As a general matter, chemicals commonly used in the cleaning of company equipment were caustic cleaning solutions, which are sodium hydroxide based, exterior brighteners, and soaps.

b. A Technical Data Sheet for Nalco 680, which was used in the pretreatment plant at Croydon, is attached as Exhibit B. The letter attached to the Technical Data Sheet indicates that Nalco 680 replaced lime in the process.

c. through f.

To the best of our knowledge, information, and belief, and after a diligent search of available records, we are unable to provide any additional responsive information for the relevant time period.

16. CLTL objects to this request as being overly broad and unduly burdensome. CLTL also objects to this request as calling for legal conclusions regarding the nature of the materials handled at the Croydon and Essington Facilities and the manner in which they were handled. Without waiving these objections or the general objections above, CLTL provides the following response.

a. After a diligent search of available records, one document responsive to this question for the relevant time period was identified – "Products To Be Cleaned At Bristol". This document is attached as Exhibit C.

b. through f.

After a diligent search of available records, we are unable to provide any additional responsive information for the relevant time period.

17.a. through i.

CLTL objects to this request as being overly broad and unduly burdensome. Without waiving this objection or the general objections above, CLTL provides the following response. To the best of our knowledge, information, and belief, and after a diligent search of available records, several documents were identified related to pickup and transportation of sludge from the Croydon facility but we are unable to determine the disposal site or the frequency of pickups. These documents are attached as Exhibit D.

18. a through e.

To the best of our knowledge, information, and belief, and after a diligent search of available records, CLTL never arranged for the transportation, disposal, or treatment of materials at the Site.

19. a through d.

CLTL objects to this request as being overly broad and unduly burdensome to the extent that it calls for information regarding entities other than CLTL. Without waiving this objection or the general objections above, CLTL provides the following response. Chemical Leaman has no information as to any other company or individual who may have arranged for the transportation, disposal, or treatment of materials at the Site.

20. a. through d.

CLTL objects to this request as calling for a legal conclusion that CLTL caused a release at the Site. CLTL further objects to the request as being overly broad and unduly burdensome in that it calls for information regarding other entities and individuals. Without waiving this objection or the general objections above, CLTL provides the following response. To the best of our knowledge, information, and belief, CLTL never spilled or caused a release of any chemicals, hazardous substances, and/or hazardous waste, and/or non-hazardous solid waste on any portion of Clearview, Folcroft, and Folcroft Annex or any other portion of the Site.

Chemical Leaman has no information as to any other company or individual who may have spilled or caused a release at the Site.

21. Neither Chemical Leaman nor anyone working on its behalf ever conducted any environmental assessments or investigations relating to alleged contamination at the Site.

22. Chemical Leaman has no information responsive to this request.

23. a. Louise Corrigan
Environmental Manager
Quality Distribution, Inc.
150 E. Pennsylvania Ave.
Suite 125
Downingtown, PA 19335
(610) 518-3122

b. Louise Corrigan
Environmental Manager
Quality Distribution, Inc.
150 E. Pennsylvania Ave.
Suite 125
Downingtown, PA 19335
(610) 518-3122

24. CLTL objects to this request as unreasonable and unduly burdensome. CLTL also objects to this request in that it requires CLTL to speculate as to the contents of documents and whether, why, and how the documents were destroyed. Without waiving these objections or the general objections above, CLTL provides the following response. CLTL adheres to federal and state requirements for the retention of designated documents and records. Policies for the retention of any other documents are left to the discretion of individual department heads.

A former Terminal Manager from the Essington facility stated that files maintained at that location were primarily driver records. At the time the Essington facility was closed, files were sent to storage and destroyed after three (3) years. CLTL has no information as to the destruction of files from the Croydon facility

Please do not hesitate to contact me at 610-518-3122 if you need any additional information.

Sincerely,

QUALITY DISTRIBUTION, INC.

James A. Rakitsky
Vice President

attachments

EXHIBIT A

(Question 4.c.)

May 31, 1972

Commonwealth of Pennsylvania
Department of Environmental Resources
Ralph W. Cook, III Environmental Protection Specialist
401 Button Wood Street
West Reading, Pennsylvania

CERTIFIED MAIL

Dear Sir:

Our Company has decided to eliminate the existing lagoons and construct a thirty foot diameter twelve ft. high pre-cast concrete holding tank. This tank would have a capacity of 52,000 gallons with a two foot free board. Enclosed is a drawing of a 10' high concrete tank manufactured by Terre Hill Concrete Products, Inc. We contemplate using their twelve ft. high tank. With an estimated flow of 3,000 gallons per day the proposed tank will provide 17 1/3 days storage.

The waste waters collected in this tank will be pumped into tank trailers and transported to approved disposal areas. We will use capacities as available at our other existing terminal facilities. The excess will be handled by contract disposal services. Three of these being: 1. A.B.M. Disposal Service

2. Eastern Industrial Corp.

3. Rollins Purle, Inc.

We are presently working with Industrial Process System, Inc. in the design of a treatment system for our waste. The system consists of a chemical physical type treatment combined with filters, one filter being a physical type followed by an

activated carbon filter. The preliminary bench testing and pilot plant running data is very promising. We are now building a prototype plant to evaluate the system under actual working conditions.

In the future, after we have developed enough data from this system we contemplate the use of this type of system to pretreat our waste and then discharge to a Municipal Sanitary System.

Our immediate plan of construction and use of a holding tank with the waste being transported to existing proper disposal systems will eliminate the impoundments and does not require a discharge to any stream or land.

Very truly yours,

CHEMICAL LEAMAN TANK LINES, INC.

Morris W. Holman, Jr. - P.E.
Asst. Mgr. - Eng. & Real Estate

MWH:cas

cc: T. R. Greenleaf

TANK TRAILER CLEANING METHODS

Trailers to be cleaned are positioned on concrete pads so constructed that all surfaces of the pad drain to a proper drain. Any concentrated chemicals remaining in the tank trailer will be removed and placed into a drum for proper disposal as it may be reclaimed for use or may be disposed of by combustion or other proper means. Trailers that have transported products requiring detergent cleaning are connected to a closed recirculating system by means of flexible hoses. Through this system and internal spinning devices, the detergent is impinged upon the internal surfaces of the tank trailer and returned to its original fixed holding tank. This recirculating process may require a minimum of twenty minutes to a maximum of ninety minutes. After this process and all the detergent has been returned to its proper holding tank, the tank trailer is disconnected from this system and hot water is flushed through the tank trailer to the floor drain which, in turn drains by gravity into the industrial pre-treatment system. Tank trailers to be cleaned by the use of steam are directly connected to overhead steam lines with all openings in the trailer closed excepting the unloading line from the trailer. The steam discharge from this tank trailer is discharged to the floor drain via the unloading line and a condensing system.

EXHIBIT B

(Question 15.b.)

INDUSTRIAL PROCESS SYSTEMS INC.

109 N. WAYNE AVENUE, WAYNE, PENNSYLVANIA 19087 (215) 687-4226

October 24, 1973

Mr. H. S. Elston
Manager, Engineering & Real Estate
Post Office Box 200
Downingtown, Pa. 19335

Dear Mr. Elston:

Please find attached the Technical Data Sheet on Nalco 680 which is presently being used at your Croydon Facility.

This data sheet lists the handling, shipping and storage precautions to be observed in the use of this product which is being used to replace lime in the process.

A copy of this data sheet is being submitted to Phil Stanford at Croydon today for his handling.

Very truly yours,

INDUSTRIAL PROCESS SYSTEMS INC.

Everett H. Schlie

EHS:sp

Enclosure

NALCO 680 is a powerful alkaline coagulant . . . free flowing, rapidly soluble, highly stable and rapid reacting. In comparison with most aluminum salts, NALCO 680 is a highly concentrated source of alumina, and because it produces no sulphate or chloride salts as by-products, it is frequently used to advantage in processes calling for alumina. It does not require alkalies for reactions.

In water softening NALCO 680 accelerates lime and soda ash reactions and improves magnesium removal.

NALCO 680

SODIUM ALUMINATE

PRINCIPAL USES

(a) Water Softening—Used with lime, or lime and soda ash, to improve hardness reduction and coagulation either in hot or cold process type water softeners. Especially effective for removal of magnesium and silica as insoluble complexes.

(b) Clarification—Used with alum, activated silica, or clay type treatments to improve coagulation in industrial and municipal water filtration plants; clarification of cane and beet sugar solutions; as a coagulant in various other processes. Provides negatively charged aluminate ions and hydroxyl ions, which, when used with alum greatly enhance coagulation results.

(c) Chemical Processes—Used as an alkaline source of alumina in various chemical processes. As near chemically pure as possible to obtain a commercial product.

FEEDING

Any iron or steel equipment may be used to feed NALCO 680, preferably in solutions of between 5 and 15%. Mechanical agitation should be used for dissolving and then stopped. Air agitation reduces stability and is not recommended.

NALCO 680 is formulated for use in "batch mix" solution feeding. For continuous dry feeding NALCO 617 sodium aluminate should be considered.

GENERAL DESCRIPTION

A white granular sodium aluminate trihydrate, completely water soluble. NALCO 680 contains the natural water of crystallization characteristic of sodium aluminate so that it not only dissolves completely, but with extreme rapidity. This characteristic combined with added stabilizers permits the preparation of stable solutions.

TYPICAL ANALYSIS

Color	White
Odor	None
Max. Solubility at 75° F.	80 parts in 100 parts water
Density	50 lbs./cu. ft.
Insoluble	Less than 0.05%
Na_2O/Al_2O_3 Molecular Ratio	1.14
Al_2O_3	46.0%
Na_2O	31.0%
Fe	Less than 0.01%
Ca & Mg	None
Heavy Metals	None
As	None

Slightly Hygroscopic

DOSAGE

Water Clarification—0.01-50ppm.
Lime Softening—0.01-25ppm.

(Continued on reverse side)

NALCO CHEMICAL COMPANY
180 N. MICHIGAN AVENUE ▫ CHICAGO, ILLINOIS 60601

CHEMICAL AND PHYSICAL PROPERTIES

The chemical formula for sodium aluminate is usually expressed as $Na_2Al_2O_4$. It is most commonly available in liquid form and as the granular trihydrate $Na_2O \cdot Al_2O_3 \cdot 3H_2O$.

Stability and reactivity of sodium aluminate solutions are dependent to a large extent on the Na_2O/Al_2O_3 molecular ratio. Solutions having a ratio of 1.0 Na_2O/ 1.0 Al_2O_3 are not stable and will hydrolyze rapidly, producing an insoluble precipitate.

NALCO 680 sodium aluminate is a hydrated product . . . produced under strictly controlled conditions to assure an exactly optimum Na_2O/Al_2O_3 molecular ratio, and with special stabilizers added that will make solutions highly stable for long periods of time. NALCO 680 is rapidly soluble by approximately 80 parts per 100 parts of water, and more highly reactive than the hydrous form of sodium aluminate.

Excessive agitation, or any other condition that tends to carbonate aluminate solutions, will reduce stability. Solution tanks should be covered to keep out foreign matter.

DOSAGE

Water Clarification—0.01-50ppm.
Lime Softening—0.01-25ppm.

HANDLING

Handling instructions for NALCO 680 are the same as for any alkali. Avoid contact with skin, eyes, and clothing. Avoid breathing dust or solution spray. Do *not take internally.*

SHIPPING

Shipped in 50 pound special lined moisture-proof and alkali-resisting multi-wall paper bags.

STORAGE

Recommended storage limit for best solubility rate and *maximum chemical reactivity is 6 months. For longest* storage life, store at 60° - 90° F temperature.

Sodium aluminate in damaged or torn bags with air exposure becomes unstable. Care should be taken to avoid this damage in handling and storage.

EXHIBIT C

(Question 16.a.)

PRODUCTS TO BE CLEANED AT BRISTOL

Following is a list of products with the number of trailers of each product cleaned from August 1st to September 16th, 1969. Please note that the waste being treated is only the rinse water of an empty cleaned trailer.

PRODUCT	NUMBER OF TRAILERS CLEANED
Acetate	3
Acetic Acid	2
Acetone	4
Acryloids	112
Alcohol	3
Alpha Piccoline	1
Anilene	18
Aqua Ammonia	1
Benzol - ene	1
Brake Fluid	1
Butyl Meth Acrylate	3
Butyl Oleate	1
Chromate	9
Chromium Sulphate	1
Cutting Oil	3
Di Butyl Amine	1
Dorotherm	2
Elvasite	3
Ester Gums	14
Fatty Acid	2
Formaldehyde	6
Glacial Methyl Acrylics	14
Glycols	9
Hylene	1
Latex	34

PRODUCT (continued)	NUMBER OF TRAILERS CLEANED (continued)
Methyl Chloro Benzene	5
Methyl Meth Acrylate	25
Nonyl Phenol	6
Paint	14
Petroleum Lube	23
Phenol	30
Pine Oil	1
Pipe Coating Oil	1
Plasticizer	96
Resin	109
Rhoplex	72
Silicate of Soda	2
Slurry (Titanium Dioxide)	26
Soap	63
Soya Oil	1
Styrene	2
Toluene Diclsocyanate	6
Toluol - ene	2
Tri Methyl Amine	1
Turpentine	1
Unedible Oils	6
Varnish (Can Coating)	44
Wax Prods (Floor)	18
Xylol - ene	1
Zinc Phoshate	2

EXHIBIT D

(Question 17.a. through i.)

INTER-OFFICE MEMORANDUM

TO Harry Elston

DATE September 7, 1972

FROM John B. Repetto

SUBJECT JULY WASTE DISPOSAL COSTS AT CROYDON

A. DIRECT LABOR

July 1 to July 1	172.26
July 2 to July 8	995.38
July 9 to July 15	1,502.58
July 16 to July 22	1,258.49
July 23 to July 29	1,363.10
July 30 to July 31	351.77
Total	5,643.58

B. SUPERVISION

1 man full time for one week then 25% split of second man rest of month	422.00

C. EXPENSES FOR MATERIALS AND SERVICES

Terminal Petty Cash	40.65
Roy F. Weston	2,492.00
ABM Disposal	1,800.00
Giordano Waste Co.	752.00
Lucis and Bros. Co.	201.00
McKesson Chemical	812.80
Delaware Valley Scrap	100.00
DuBois Chemical	336.98
Total	6,535.43

D. Payment for transportation of waste by leased operators 1,988.00

E. Depreciation of equipment and buildings - waste disposal only 2,252.58

F. Utilities per allocation percentage 267.34

SIGNATURE

INTER-OFFICE MEMORANDUM

TO T. R. Greenleaf

DATE Sept. 8, 1972

FROM H. S. Elston

SUBJECT CROYDON SLUDGE

Attached Invoice in the amount of $4,817.70 for processing 321,180 gallons of sludge represents a savings of $6,983.00.

We presently pay $200 a load to ABM Disposal to take our sludge. 321,180 gallons represents 59 loads at $200 or $11,800.00 that did not go to ABM.

SIGNATURE H. S. Elston cas

CERTIFIED MAIL

7000 1670 0012 0864 8826

ORIGINAL (Red)

QUALITY DISTRIBUTION

150 E. PENNSYLVANIA AVENUE, SUITE 125
DOWNINGTOWN, PA 19335

TO:

OCT 19

Ms. Carlyn Winter Prisk (3HS11)
U.S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029